

1 Michael V. Severo, Esq. (SBN.: 072599)
2 **THE SEVERO LAW FIRM**
3 301 N. Lake Avenue, Ste. 315
4 Pasadena, CA 91101
5 (626)844-6400
6 msevero@mvslaw.com

7 Attorney for Defendant,
8 CHRISTOPHER KAMON

9
10
11 **UNITED STATES DISTRICT COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

13 UNITED STATES OF AMERICA,
14
15 Plaintiff,

16 vs.

17 CHRISTOPHER KAMON,
18 Defendant.

Case No. 2:23-cr-00047-JLS-2

**DECLARATION OF MICHAEL V.
SEVERO IN SUPPORT OF REQUEST
FOR SUBSTITUTION OF
ATTORNEY**

Hon. Josephine Staton
Courtroom 8A,
First Street Courthouse

19 I, Michael V. Severo, do hereby declare as follows:

- 20 1. I am an attorney at law duly licensed to practice before all courts in the State of
21 California and the U.S. District Court for the Central District of California.
- 22 2. I offer this declaration in support of defendant's Request for Substitution of
23 Attorney.
- 24 3. On September 20, 2023, defendant Christopher Kamon executed form G-01,
25 requesting that I be substituted in as his counsel of record in place of Jack DiCanio,
26 Esq., Allen L. Lanstra, Esq., and Matthew John Tako, Esq., all attorneys at Skadden
27 Arps Meagher and Flom LLP.
- 28

1 4. Form G-01, being filed concurrently herewith, requires the signature of
2 withdrawing counsel.

3 5. On the same date, September 20, 2023, at approximately 4:30 p.m., I personally
4 sent a copy of the executed G-01 form to Mr. DiCanio, Mr. Lanstra and Mr. Tako.

5 6. Not having heard from any of the named attorneys, I again sent an email, with
6 the G-01 forms attached to all three on September 21, 2023, at approximately 11:49 a.m.

7 7. On September 21, 2023, at approximately 3:45 p.m., I placed a telephone call to
8 Mr. DiCanio. I spoke with his assistant, Sarah, who informed me that Mr. DiCanio was
9 in trial, and that both Mr. Lanstra and Mr. Tako may also be in trial. Sarah stated she
10 would email Mr. DiCanio and alert him to my emails.

11 8. As of the time of this filing, I have not yet received the signed forms, nor an
12 acknowledgement by any of the aforesaid counsel that it had been received.

13 9. This matter is currently set for trial on December 12, 2023, and I am informed
14 that the government has produced substantial discovery, although I am informed that it
15 has not been reviewed with Mr. Kamon.

16 10. Accordingly, I request that the court approve the substitution without the need
17 for withdrawing counsel to sign the G-01 form.

18 THE SEVERO LAW FIRM

19
20 Date: September 22, 2023

By /s/ Michael V. Severo

21 MICHAEL V. SEVERO
22 Attorney for Defendant
23 CHRISTOPHER KAMON
24
25
26
27
28